



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

December 5, 1994

Mr. Rus Purcell  
Project Coordinator  
Kennedy/Jenks Consultants  
17310 Red Hill Ave.  
Suite 220  
Irvine, CA 93309

Re: Pacific Airmotive Corp.  
Administrative Order No. 94-10

Dear Mr. Purcell:

This letter serves two purposes:

- 1) to conditionally approve the Partial Remedial Investigation Report, dated September 9, 1994, prepared for the Pacific Airmotive Corporation (PAC) site located at 2940 North Hollywood Way in Burbank, CA; and
- 2) to conditionally approve the Multi-Depth Soil Gas Investigation Work Plan submitted to EPA by a letter dated November 15, 1994.

Regarding the Partial RI Report, EPA would like to clarify the statement on page 1 that EPA has agreed to exclude the property at 3003 North Hollywood Way from the Partial RI. EPA has deferred indefinitely the requirement in the Administrative Order that PAC conduct a soil gas investigation at the 3003 North Hollywood Way property, based on PAC's assertions that solvents were not used at that location. Should information to the contrary become available, EPA reserves the right to require further investigation at 3003 North Hollywood Way.

Also regarding the Partial RI Report, EPA concurs with the Regional Water Quality Control Board's (RWQCB) written comment of September 21, 1994. RWQCB pointed out that the groundwater detection limits for jet fuel were set at 10 mg/l, making it misleading to draw conclusions that jet fuel is non-detectable in groundwater beneath the site. EPA concurs with RWQCB that the detection limit for jet fuel A (EPA Method 8015) should be set at 100 ug/l for remaining analyses under the Partial RI work plan.

In addition, it has come to RWQCB's attention that Transglobal Environmental Geochemistry (TEG), the soil gas contractor for this Partial RI, has in general been adjusting the

analytical machine response range during sample runs as a routine practice in lieu of performing proper dilution. Therefore, the soil gas test results above the calibration range for the Partial RI at the PAC site are considered questionable at this time. The lack of confidence in this data makes it difficult to resolve what appear to be inconsistencies between soil gas data obtained from the adjacent Lockheed property and the data obtained from the PAC property.

Therefore EPA approves the Partial RI Report based on the following conditions:

- 1) PAC either independently or through Kennedy/Jenks must reply to EPA in writing, acknowledging that it is unknown whether jet fuel is present at the site at levels below 10 mg/l, and agreeing, for future analyses under this Partial RI, to use the detection limits recommended by RWQCB in their letter of September 21, 1994. This correspondence shall be incorporated as an addendum to the draft report dated September 9, 1994.
- 2) Given EPA's and RWQCB's concern regarding the dilution methods employed by TEG, a minimum of six of the soil gas sampling points in Area F and Area G must be resampled to confirm the reported PCE concentrations. This data must be submitted to EPA and RWQCB and incorporated as an addendum to the draft report dated September 9, 1994. These additional soil gas analyses must utilize proper dilution procedures. Adjusting the analytical machine response range during sample runs in lieu of performing proper dilution, is unacceptable.
- 3) All chromatograms of soil gas samples with concentrations above the calibration range during the first phase of soil gas investigation must be submitted for further review, including those for the additional analyses requested in item 2 above.

Regarding the Multi-Depth Soil Gas Investigation Work Plan, EPA approves this plan based on the following conditions:

- 1) The two sampling events should take place at points in time 1 week and 6 weeks after installation of the probes is complete (in order to allow adequate time for equilibrium).
- 2) The location of probes is to be agreed upon by EPA and/or the RWQCB in the field before installation takes place. A proposed location map was not included in the work plan, however, EPA requires that the probes be located in the approximate locations discussed at the November 7, 1994, meeting between PAC, Kennedy/Jenks,

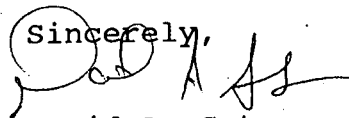
EPA, and RWQCB. EPA and RWQCB propose that two of the probes be installed in approximate locations F5 and G3.

- 3) Soil gas analyses conducted during this second phase of investigation must utilize proper dilution procedures. Prior to commencing field work, the performing soil gas contractor must provide a statement in writing that adjusting the analytical machine response range during sample runs as a routine practice is unacceptable, and must provide written procedures to ensure this practice is not utilized during the second phase multi-depth soil gas investigation.
- 4) All chromatograms of soil gas samples during the second phase multi-depth soil gas investigation to be performed must be submitted along with the reported results.

Once again, the proposed plan may be amended by PAC or Kennedy/Jenks informing EPA and RWQCB in writing that the above-listed conditions are acceptable. This correspondence shall be made an addendum to the Multi-Depth Soil Gas Investigation Work Plan submitted to EPA by a letter dated November 15, 1994.

If you have any questions, please call me at 415-744-2260.

Sincerely,



David A. Seter  
Remedial Project Manager

cc: W. Gross, PAC  
Y. Rong, RWQCB  
M. Rongone, EPA